



DEPARTMENT OF THE NAVY
SOUTHWEST DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
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ALAMEDA POINT
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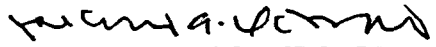
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September 18, 2000

From: Commander, Southwest Division, Naval Facilities Engineering Command
To: Distribution

Subj.: NAVY RESPONSES TO REVIEW COMMENTS ON DRAFT FINAL REMEDIAL ACTION PLAN/RECORD OF DECISION FOR MARSH CRUST AND GROUNDWATER AT FLEET INDUSTRIAL SUPPLY CENTER, ALAMEDA FACILITY, ALAMEDA ANNEX AND FOR THE MARSH CRUST AND FORMER SUBTIDAL AREA AT ALAMEDA POINT.

Encl: (1) Navy responses to comments from Department of Toxic Substances Control, letter from Ms. Mary Rose Cassa of September 01, 2000
(2) Navy responses to comments from United States Environmental Protection Agency, email from Mr. Phillip Ramsey of August 30, 2000

1. Enclosure (1) and (2) are forwarded for your information and use.
2. We have discussed all the above comments in the enclosures and the Navy will revise the draft final Remedial Action Plan/Record of Decision (RAP/ROD) to incorporate the resolutions of comments in the final RAP/ROD.
3. Should you have any questions regarding this matter, please call me at (619) 532-0969 or Mr. Michael McClelland, BRAC Environmental Coordinator at (619) 532-0965.


LUCIANO A. OCAMPO, PE
Remedial Project Manager
By direction of the Commander

Subj.: NAVY RESPONSES TO REVIEW COMMENTS ON DRAFT FINAL
REMEDIAL ACTION PLAN/RECORD OF DECISION FOR MARSH
CRUST AND GROUNDWATER AT FLEET INDUSTRIAL SUPPLY
CENTER, ALAMEDA FACILITY ALAMEDA ANNEX AND FOR THE
MARSH CRUST AND FORMER SUBTIDAL AREA AT ALAMEDA POINT.

Distribution:

California Department of Toxic Substances Control (Attn.: Ms. Mary Rose Cassa)
California Regional Water Quality Control Board (Attn.: Mr. Brad Job)
United States Environmental Protection Agency (Attn.: Mr. Phillip Ramsey)
Alameda Point Restoration Advisory Board (Attn.: Ms. Mary Sutter)
Alameda County Department of Environmental Health (Attn.: Mr. Larry Setto)
United States Fish and Wildlife Service (Attn.: Mr. Steve Schwarzbach)
National Oceanic Atmospheric Agency (Attn.: Ms. Laurie Sullivan)
Bay Area Air Quality Management District (Attn.: Mr. Julian Elliot)
California Fish and Game (Attn.: Ms. Susan Ellis)
ERM West (Attn.: Mr. Mike Quillin)
Russell Resources, Inc. (Attn.: Mr. Peter Russell)
Catellus Development Corporation (Attn.: Mr. James Adams)
Restoration Advisory board Co-chair (Attn.: Mr. Ken Hansen)
City of Alameda (Attn.: Mr. Jeff Bond)

**RESPONSE TO COMMENTS DATED SEPTEMBER 1, 2000
FROM MARY ROSE CASSA, CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY,
DEPARTMENT OF TOXIC SUBSTANCES CONTROL
ON THE DRAFT FINAL REMEDIAL ACTION PLAN/RECORD OF DECISION AND
RESPONSIVENESS SUMMARY FOR THE MARSH CRUST AND GROUNDWATER AT THE
FLEET AND INDUSTRIAL SUPPLY CENTER OAKLAND ALAMEDA
FACILITY/ALAMEDA ANNEX AND FOR THE MARSH CRUST AND FORMER SUBTIDAL
AREA AT ALAMEDA POINT, AUGUST 18, 2000**

RAP/ROD

Comment 1: The text in several places states, "The Navy has included Environmental Restrictions addressing marsh crust land use controls pursuant to California Civil Code Section 1471 in the deeds transferring title to the Alameda Facility/Alameda Annex and Alameda Point to the City of Alameda on July 20, 2000." As written, the text indicates that all environmental restrictions required by this RAP/ROD are already in place. It is true that the deed transferring FISC Annex is in place, but only the East Housing portion of Alameda Point has been transferred. Please correct all occurrences in the text to indicate that deeds transferring title in the future will also contain the appropriate environmental restrictions.

Response: Changes were made to Sections 1.4, 2.1.2, 2.9.1, 2.9.2, 2.12.1 and 2.12.2 that reflect the exact title of the property as shown on the actual deeds. Specifically, the two deeds are for "FISC Alameda" and for "East Housing Portion of NAS Alameda." Language has also been added to reflect that the same restrictions will be included in future deeds.

Comment 2: The text in several places states, "On July 20, 2000, DSTSC and the City of Alameda entered into a Covenant to Restrict Use of Property (Covenant) that includes Environmental Restrictions addressing marsh crust land use controls pursuant to California Civil Code Section 1471 and Health and Safety Code (SHC) Section 25355.5." As written, the text indicates that the cited covenant addresses all land use controls required by this RAP/ROD. The July 20, 2000 covenant between DTSC and the City of Alameda addresses only the FISC Annex and the East Housing Portion of Alameda Point. Please correct all occurrences in the text to indicate that future transfers of property included in the marsh crust/subtidal area of Alameda Point will require a similar covenant.

Response: Changes were made to Sections 1.4, 2.1.2, 2.9.1, 2.9.2, 2.12.1 and 2.12.2 to reflect the exact title of the property shown on the covenant. Specifically, the Covenant to Restrict Use of Property is for "Fleet and Industrial Supply Center, Oakland, Alameda Facility and Alameda Annex, and Alameda Naval Air Station East Housing." Language has also been added to reflect that the same restrictions will be included in future deeds.

Comment 3: Section 2.2.1 contains the following new text in reference to historic activities at the San Francisco Bay Airdrome: "The use, storage and uncontrolled disposal of these materials may have resulted in the contamination of groundwater at the site." Section 2.5.4 contains similar new text: "It is likely that the use, storage and uncontrolled disposal of hazardous materials and associated wastes from the Airdrome operations may be a source of this widespread contamination." The Navy has not presented information to substantiate either of these statements in any documents leading up to the RAP/ROD. These statements are not relevant to the selected remedy, and should not be introduced at this point in the process.

Response: The text has been removed from Sections 2.2.1 and 2.5.4 as suggested.

Comment 4: The Removal Action Workplan for Marsh Crust at East Housing (May 2000) should be included in the discussion of environmental investigations and remedial actions (Section 2.2.2) and added to the reference list.

Response: The reference was added.

Comment 5: As discussed during the conference call on August 24, 2000, Section 2.14, Documentation of Significant Changes, provides an opportunity to point the reader to several changes in the text, including deleting the qualitative discussion of risks in favor of a more quantitative discussion, and enhancing the discussions of permanent solutions and trade-offs (Sections 2.13.1 and 2.13.2). These changes, however, should not be confused with "significant changes" in the context of the NCP regarding changes to the remedy itself as a result of public comment.

Response: The Navy and DTSC agreed to add this language as Appendix F.

Comment 6: The revised preliminary Nonbinding Allocation of Responsibility is enclosed.

Response: Comment noted.

RESPONSIVENESS SUMMARY

Comment 1: (RS Comment 1) It appears that the commenter is largely concerned about homegrown produce, which sounds different from "food crops" protected by government restrictions on irrigation wells. This response should also include information addressing volatilization of benzene during overhead irrigation and anticipated low (or no) uptake of the COC by plants through leaves and other surfaces. For drip irrigation, that pathway would not exist, and root uptake issues could be addressed using an argument extracted from the pre-existing "fruits&nuts" document.

Response: Clarification was added to the response. Specifically, the reference was changed to correspond to the commenter's "fruit trees and vegetables" and to explain that irrigation would kill plants. No changes to the RAP/ROD were needed.

Comment 2: (RS Comment 4) The August 18 version of the RAP/ROD did not include the requested reference to the East Housing RAW in the appropriate location (Section 2.2).

Response: As stated in Response 4 above, this addition was completed.

Comment 3: (RS Comment 5) Please revise the second sentence of the comment summary as follows: "AE gave the example of a recently passed resolution by the Alameda Facility/Alameda Annex Alameda Naval Air Station Restoration Advisory Board (RAB) on dated April 4, 2000 that notified notifying the City of Alameda that the excavation ordinance, which is one of three components of the selected alternative, suffers from significant deficiencies."

Insert "Alameda Naval Air Station" before "RAB" in the fourth sentence and delete the parenthetical information.

Response: The changes were made to the Responsiveness Summary as suggested; no changes to the RAP/ROD needed.

Comment 4: (RS Comment 7) The response lacks information responding to CRC comments 4,5, and 6. To address CRC comment 4 (extent of marsh crust groundwater contamination), the response should state that all data used to define the nature and extent of the marsh crust/subtidal area are contained in the relevant RI reports. To address CRC comment 5 (northern boundary of subtidal area), the response should state that the marsh crust and subtidal deposits have a specific definition. Contamination identified in areas previously believed to be "clean" is not within the scope of this document; however, such identification is useful and will be considered as the investigations at Alameda Point progress.

Response: The changes were made to the Responsiveness Summary as suggested; no changes to the RAP/ROD needed.

Comment 5: (RS Comment 8) Please check the use of "benzo(a)pyrene in the last sentence; it appears that the word should be "benzene." Please revise the second sentence of the response as follow: "The Navy acknowledges that additional investigation might result in a more definitive description of the distribution of contamination in the marsh crust/subtidal area.

The response should address Arc's concern (4e) about marsh crust contaminants in the soil column other than the marsh crust, e.g. something to this effect: "in the conceptual model, the marsh crust is a discrete depositional layer of a unique and definable soil type. In the model, some areas within this definable layer are contaminated. The processes that resulted in the marsh crust layer, and the processes that resulted in contamination in some regions of the marsh crust, are distinct from processes that resulted in the presence of other soil layers and processes that may have resulted in contamination of those other soil layers. PAH contamination in soil above the marsh crust is not within the scope of this RAP/ROD."

The response should also address Arc's concerns (3) about groundwater, e.g., something to this effect: "Areas outside of the FISC Annex (e.g., the Alameda Naval Air Station property impacted by the benzene plume) are not within the scope of the RAP/ROD. The groundwater-to-indoor air pathway for the Alameda Naval Air Station will be evaluated during ongoing investigations."

The last sentence in the first paragraph could be recast to eliminate reference to a specific review period (e.g., "remedy review process").

Response: The changes were made to the Responsiveness Summary as suggested; no changes to the RAP/ROD needed.

Comment 6: (RS Comment 9) DTSC has determined that notes on bore-hole logs regarding "hydro-chloride" are not an error on the part of CRC. The term is present on at least 17 boring logs. Rather, the term "hydro-chloride" is probably an artifact of transcription in which "hydrocarbon" was incorrectly typed as "hydro-chloride." (Similarly, inspection of the logs indicates that "HC " as shorthand for hydrocarbon was probably incorrectly transcribed as "HCl.") To complete the response, some information will have to be added about common occurrences of petroleum odors, sheen, etc in bore holes and how these occurrences are interpreted.

Response: The changes were made to the Responsiveness Summary as suggested; no changes to the RAP/ROD needed.

Comment 7: (RS Comment 10) The statement of the comment does not adequately address the scope of the cited comments. CRC comment 19 addresses prohibition of wells for monitoring and cleanup. The response about future excavations/cleanup actions does not accurately address CRC's comment. The comment reads, in part, "The proposed CERCLA remedy for the mars crust imposes a permit requirement on future cleanup excavations that may be conducted at the Alameda Point Superfund site." This can be interpreted to say that CRC believes the remedy, as stated, imposes permit requirements on excavations related to cleanup activities. The Navy seems to have interpreted the comment to say that future excavations (e.g., public works operation sand maintenance or infrastructure replacement activities) would be perceived as cleanup actions. An alternative, perhaps more appropriate, response would be something to the effect that CERCLA cleanup activities are exempt from obtaining permits, but the activities must meet the substantive requirements of any relevant permits.

In the last paragraph of the response to Comment 10, please insert "covenant and" before the "Environmental Restrictions in Deed." To complete the response to Arc's concerns, a statement should be added that includes volatilization of benzene, little or no uptake by plants anticipated, and overwatering is not anticipated to result in significant discharges to the storm drain system and, subsequently, the Bay.

For completeness, the response should restate the geographic scope of the remedy (FISC Annex and a specific portion of Alameda Naval Air Station) and that the City's ordinance encompasses a much larger area ("former Naval Air Station Alameda and Fleet Industrial Supply Center, Alameda Annex and Facility" [sic]).

Response: The changes were made to the Responsiveness Summary as suggested; no changes to the RAP/ROD needed.

Comment 8: (RS Comment 11) The premise of the response is inaccurate. Future construction and development are precisely the rationale for the remedy selected in the RAP/ROD. The response should articulate the concept that development carried out within the constraints of the selected remedy and pursuant to the laws of the State of California is not expected to result in adverse impacts to endangered species or their habitats.

In the response, 4th sentence, please consider replacing "site investigation" with "remedial investigation." Please consider rewriting the last sentence of the response as follows: "Although CRC's argument that other parameters could be used is valid, the Navy believes that excess ecological risk is low, considering the limitations of the exercise."

Response: The changes were made to the Responsiveness Summary as suggested; no changes to the RAP/ROD needed.

Comment 9: (RS Comment 12) In the second sentence of the response, please consider replacing "...into schools" with "... into indoor air, and included a school scenario." IN the fourth sentence, please consider replacing "... a school site is formally proposed..." with "...certain conditions are met." This sentence could cite the California Education Code, Sections 17210-17223. Please consider adding the following before the last sentence: "Some photodegradation may have occurred, but was likely not sufficient to significantly deplete the large masses of PAH in the waterways and marshes." Consider changing the

last sentence as follows: "...encapsulation, further photodegradation of PAHs would not have occurred."

Suggested revision:

"...the air quality risk assessments reported in the RI/FS used commonly accepted and conservative assumptions to determine the potential risk from volatilization of benzene into schools indoor air and included a school scenario. The results clearly showed that volatilization would not create an unacceptable risk for either school students or adult school workers. In addition, the requirements of the state code identified by CRC are not triggered until a school site is formally proposed certain conditions are met (California Education code, Sections 17210-17224 and are not considered applicable or relevant and appropriate requirements (ARAR) for this remedial action."

"San Francisco Bay. Some photodegradation may have occurred, but was likely not sufficient to significantly deplete the large masses of PAH in the waterways and marshes. Because of this deep encapsulation, further photodegradation of PAHs would never not have occurred."

Response: The changes were made to the Responsiveness Summary as suggested; no changes to the RAP/ROD needed.

Comment 10: (RS Comments 14 and 15) Please ensure these members are on the mailing list. If already on the list, please state that this has been verified. If not already on the list, please state that they will be added and make the addition. Has the Navy forward any previous fact sheets or other information to the writer of Comment 15?

Response: The changes were made to the Responsiveness Summary as suggested; no changes to the RAP/ROD needed.

**RESPONSE TO COMMENTS DATED AUGUST 30, 2000
FROM PHILLIP RAMSEY, U.S. ENVIRONMENTAL PROTECTION AGENCY,
ON THE DRAFT FINAL REMEDIAL ACTION PLAN/RECORD OF DECISION FOR THE MARSH
CRUST AND GROUNDWATER AT THE FLEET AND INDUSTRIAL SUPPLY CENTER
OAKLAND ALAMEDA FACILITY/ALAMEDA ANNEX AND FOR THE MARSH CRUST
AND FORMER SUBTIDAL AREA AT ALAMEDA POINT, AUGUST 18, 2000**

- Comment 1:** Please restore in text references to U. S. EPA involvement with the Marsh Crust RAP/ROD. This document should be signed by U.S. EPA since it deals, in part, with land which is part of the NPL site (see U.S. EPA's June 9, 2000, draft Proposed Plan/draft RAP/ROD review letter, Marsh Crust RAP/ROD comment number 1).
- Response:** These changes were made to Sections 1.4, 2.1.2, 2.9.1, 2.9.2, 2.12.1 and 2.12.2 and to the signatory page.
- Comment 2:** Please restore in text reference to U. S. EPA involvement with LUCICP review and approval. (see U. S. EPA's July 19, 2000, draft RAP/ROD review letter, comment number 5).
- Response:** These changes were made to Sections 1.4, 2.1.2, 2.9.1, 2.9.2, 2.12.1 and 2.12.2.
- Comment 3:** The discussion of the July 20, 2000 deed transferring title from the Navy to the City of Alameda is confusing. The implication is that this deed transferred the entire Alameda Point. The document should clarify what was transferred. Assuming that what was transferred was only the Annex and the East Housing area, the discussion of Environmental Restriction in Deed (page 1-3 of redline version), line three should read, "the Alameda Facility/Alameda Annex and portions of Alameda Point to the City of Alameda..." In addition there should be a sentence that the same restrictions will be included in any future deeds transferring other portions of Alameda Point which might include Marsh Crust. (same issue on page 2-24 and on page 2-47 of redline version).
- Response:** The language describing the deeds has been revised to reflect the property titles that are on the property transfer deeds. Specifically, the two deeds are for "FISC Alameda" and for "East Housing Portion of NAS Alameda." These changes were made to Sections 1.4, 2.1.2, 2.9.1, 2.9.2, 2.12.1 and 2.12.2. Language has also been added to reflect that the same restrictions will be included in future deeds.
- Comment 4:** Similarly, references to the July 20, 2000 covenant between DTSC and the City (e.g., item 2 on page 1-5 of the redline version) should clarify what property is covered. (Same language on page 2-24 and 2-47 of redline version.)
- Response:** The language describing the covenant has been revised to reflect the property titles that are on the covenant. Specifically, the Covenant to Restrict Use of Property is for "Fleet and Industrial Supply Center, Oakland, Alameda Facility and Alameda Annex, and Alameda Naval Air Station East Housing." These changes were made to Sections 1.4, 2.1.2, 2.9.1, 2.9.2, 2.12.1 and 2.12.2.
- Comment 5:** U. S. EPA's July 19, 2000, draft RAP/ROD review letter, comment number 10, stated "U. S. EPA considers it crucial that the Navy acknowledge that it can and will enforce the Environmental Restriction in the Deed. The document should make it clear that the Navy can and will enforce the restrictions in the Deed." Language that "future compliance

with the provisions will be the responsibility of DTSC" implies that the Navy is leaving all compliance responsibility to DTSC. This language is on page 2-25 and 2-36 of the redline version.

Response: The language clarifying enforcement has been added to Sections 1.4, 2.1.2, 2.9.1, 2.9.2, 2.12.1 and 2.12.2. Specifically, the text "and shall be enforced by the Navy when necessary and appropriate" has been added and the text "future compliance with the provisions will be the responsibility of the DTSC" has been deleted.

Comment 6: The RAP/ROD should use the same terms as the Proposed Plan for characterizing Marsh Crust contamination. The Proposed Plan refers to PAHs and TPH, while the RAP/ROD used various terms including SVOCs and "compounds." Consistent with the Marsh Crust Proposed Plan, U.S. EPA recommends that the RAP/ROD refer to the Marsh Crust soil contamination as containing PAHs and TPH.

Response: In a phone call on September 5, 2000, the Navy explained that the different language was used in the Proposed Plan to meet the reading level goals for public documents at the suggestion of the community involvement experts. It was agreed that the more correct technical terms would be left in the RAP/ROD.

Comment 7: Sections 2.2.1 and 2.5.4, contains statements which indicated the historical former San Francisco Bay Airdrome may have used/stored hazardous chemical and may have disposed of hazardous chemicals, which may have resulted in groundwater contamination. U.S. EPA does not believe these statements have been supported by site documentation or site investigations and we request that they be deleted from the text.

Response: The language which indicated that historic use, storage and disposal of hazardous chemicals may have resulted in groundwater contamination was deleted from Sections 2.2.1 and 2.5.4, as suggested.

Comment 8: In Section 2.2.2, the description of Alameda Point includes only 4 Operable Units. Please update text to provide current status (i.e., 6 OUs).

Response: In the September 5, 2000 it was agreed to correct the number of operable units to 5.